

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

KOOKMIN BANK,

Defendant.

Adv. Pro. No. 12-01194 (CGM)

STIPULATION AND ORDER

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and defendant Kookmin Bank (“Defendant,” and with the Trustee, the “Parties”), by and through their respective and undersigned counsel, state as follows:

IT IS HEREBY STIPULATED AND AGREED, that, the deadline for the Defendant to respond to the complaint in the Action (ECF No. 1) shall be March 7, 2022. If Defendant files a motion to dismiss the complaint, such motion shall set forth any and all grounds for dismissal

required to be asserted at the pleading stage. The deadline for the Trustee to respond to the motion shall be May 6, 2022, and the deadline for the Defendant to file a reply shall be June 6, 2022.

IT IS HEREBY STIPULATED AND AGREED, that if Defendant files a motion to dismiss the complaint, then the parties shall request oral argument on the motion at the Court's first available convenience.

Dated: January 26, 2022
New York, New York

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Attorneys for Defendant Kookmin Bank

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

Dated: January 27, 2022
Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge